

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION**

<b>SOVERAIN SOFTWARE LLC,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>C.A. No. 6:07-cv-511-LED</b>
	)	
<b>CDW CORPORATION, ET AL.</b>	)	
	)	
<b>Defendants.</b>	)	
	)	
	)	

**PLAINTIFF’S UNOPPOSED MOTION FOR EXTENSION OF  
PRE-TRIAL DEADLINES REGARDING DAMAGES EXPERTS**

COMES NOW, Plaintiff Soverain Software, LLC (“Soverain”) and files this its unopposed motion for extension of pre-trial deadlines regarding damages experts and would show the Court as follows:

## I.

Soverain moves for an extension of time with respect to the following pre-trial deadlines:

<b>Event:</b>	<b>Current Deadline:</b>	<b>Proposed Deadline:</b>
Expert Reports - Damages	July 23, 2009	August 4, 2009
Rebuttal Expert Reports - Damages	August 18, 2009	August 31, 2009
Discovery Deadline-depositions of damages experts	September 4, 2009	September 25, 2009

## II.

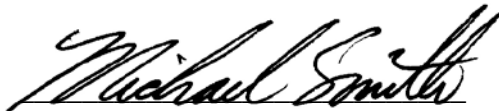
The reason for this motion is the recent production by Defendant Newegg, Inc. of large quantities of information responsive to Plaintiff's request for documentation relating to Plaintiff's

damage theory, which requires the above brief extensions of the deadlines to permit the parties' damages experts to evaluate and opine on the damages issues in this case.

The requested extensions will not affect the trial date or other pre-trial deadlines and is necessary in order for the parties to properly comply with their pre-trial responsibilities in an orderly fashion. This extension is not sought for purposes of delay, but so that justice may be done.

Wherefore, Sovereign respectfully moves for an extension of time regarding the foregoing deadlines.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael C. Smith", written in a cursive style.

Michael C. Smith  
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COUNSEL FOR SOVERAIN SOFTWARE, LLC

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) this the 23rd day of July, 2009. Any other counsel of record will be served by facsimile transmission and/or first class mail.

A handwritten signature in black ink, reading "Michael C. Smith", is written over a horizontal line.

Michael C. Smith